



August 30, 2010

Carol Rowan, BLS Clearance Officer
Branch of Policy Analysis
Division of Management Systems
Bureau of Labor Statistics
Postal Square Building
2 Massachusetts Avenue, NE
Washington, DC 20212

RE: American Time Use Survey (ATUS) New Modules on Eldercare and Workplace Paid and Unpaid Leave and Flexibility

Dear Ms. Rowan,

The National Partnership for Women & Families applauds the Department of Labor (DoL) and the Bureau of Labor Statistics (BLS) for adding—for the first time—proposed questions on eldercare and a new module concerning paid and unpaid workplace leave and flexibility to the American Time Use Survey (ATUS). We are particularly pleased that you are acknowledging the importance of collecting nationally representative data on family and informal caregiving as it is central to the National Partnership's work-family program activities as well as to the work of our initiative, the *Campaign for Better Care* (CBC). The Campaign is working to ensure the effective implementation of health reform so that the most vulnerable populations—older adults with multiple chronic conditions and their families—can fully realize the promise of better care. We appreciate that the survey will now capture the substantial periods of time millions of family caregivers spend caring for their loved ones.

As advocates, we also know that the United States workforce has changed considerably in recent decades and workers are now more likely than ever before to shoulder caregiving responsibilities for children and/or elderly relatives. We see time and time again that paid time off and workplace flexibility policies play a central role in helping workers meet all of their competing responsibilities at home and at work.

As the Department of Labor and Bureau of Labor Statistics continue to develop the ATUS, we urge you to consider the following suggestions for the proposed eldercare questions and paid and unpaid workplace leave and flexibility module:

Eldercare Module

- 1. In the introductory paragraph and Q1, consider replacing “condition related to aging” with “chronic health condition.”** It is important to note that not all chronic health conditions are related to aging. Older adults that need assistance tend to have more than one chronic

condition and these conditions—either physical or cognitive—are exacerbated by aging, not caused by it. By limiting older adults' need for help to "aging" only, the survey is not capturing many of the demanding tasks unpaid family caregivers take on.

Because the introductory paragraph of the module gives the example of "as people grow older" and Qb2 asks the age of the person being cared for, incorporating this change will not impact the survey's ability to collect accurate data on the number of Americans providing unpaid eldercare.

2. **Consider adding an additional "yes/no" question to the module: "Has the person you care/cared for been hospitalized in the past year?"** By including this question, the ATUS would provide important information on the level of illness and chronic care needs of older adults, including the potential need for their family caregivers to take leave from their employment for eldercare responsibilities. The responses to this "yes/no" question would offer insight into the difference between individuals who provide care for older adults who manage in their homes with some assistance and those providing eldercare to older adults with more acute health problems and care needs.

Workplace Leave Module

1. **Consider adding paid leave questions to the monthly Current Population Survey.** The data collected through the ATUS paid leave module will have tremendous utility and is a very promising first step in better work-family data collection. This data will help federal lawmakers assess the extent to which private sector policies are meeting workers' needs and identify public policies that are necessary to assure that minimum standards exist for all workers. We hope that the ATUS findings motivate the BLS to consider the inclusion of access to paid and unpaid leave in other, larger sample surveys. In particular, we hope to see these kinds of questions incorporated into a future revision of or supplement to the Current Population Survey so that we know more about these important labor policies and their usage.

Thank you for the opportunity to offer feedback and recommendations on the ATUS. We look forward to reviewing the results of the survey and hope to continue to work with you in the future on these important issues.

Sincerely,



Debra L. Ness
President